

EXHIBIT H

fax

TO:	Lincoln Law –Tessa Meyer Santiago	FROM:	Ben Ganter
FAX:	800-584-6826	PAGES:	13
PHONE:	8007226578	DATE:	10/1/2013
RE:	Response to Interrogatories	CC:	Carl Gustafson

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Comments: Tessa,

I sent these discovery response to my attorney Wendy Harris back in late July and have been recently made aware of their failure to deliver them to your office. I apologize for the informal style of response but I am not an attorney and typically have counsel create a formal version for submission. Currently, HPF does not have any employees on staff and I am the only person receiving and responding to requests. As you may be aware, HPF is in the process of winding down as a corporate entity.

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA**

In Re:) BANKRUPTCY CASE NO.: 10-71788
Jesus Edgar Montano,)
Debtor) Chapter 7
)
HERITAGE PACIFIC FINANCIAL,) ADVERSARY CASE NO.: 11-04008
LLC, a Texas Limited Liability Company)
Plaintiff,) DEFENDANT'S INTERROGATORIES TO
v.) JUDGMENT-DEBTOR HERITAGE PACIFIC
JESUS EDGAR MONTANO,) FINANCIAL, LLC PURSUANT TO RULE 69
Defendant.)

Before Honorable Judge William J Lafferty

**DEFENDANT JESUS MONTANO'S INTERROGATORIES
TO JUDGMENT DEBTOR HERITAGE PACIFIC FINANCIAL, LLC**

Defendant Jesus Edgar Montano, a judgment creditor and pursuant to Rules 69(a) and 33 of the Federal Rules of Civil Procedure, submits the following interrogatories to judgment debtor Heritage Pacific Financial, LLC. Each interrogatory is to be answered fully and under oath or

Interrogatories

Defendant expressly reserves the right to supplement, clarify, revise, or correct any or all of the responses and objections herein, and to assert additional objections or privileges, in one or more subsequent supplemental response(s).

1. Christopher David Ganter
2200 K Ave #200
Plano, TX 75074
972-996-5100
CEO of Heritage Pacific Financial, LLC
2. HP Locate, LLC 2200 K Ave, #200 Plano TX 75074, HP Debt Exchange LLC 2200 K Ave, #200 Plano TX 75074, Crossland Concepts LLC 10521 Rogers Rd Frisco TX 75033
3. No
4. HP Debt Exchange, 2200 K Ave #200 Plano TX 75074
5. See attached spreadsheet Exhibit 1. While HPF was in the business of collecting debts it does not retain ownership of the accounts it worked. Once a collection was received or a judgment was obtained the funds or the judgment was sent to the owner. All judgments obtained have been transferred back to original owner or transferred to a third-party at the direction of the original owner. In a few rare instances a judgment was assigned to a judgment collection company for further collection work and funds were funneled back through HPF to the owner. HPF only received a 30% collection fee once funds were received if received at all.
6. Capital One Bank 1221 East Spring Creek Parkway Plano TX 75074 Acct #3620973857 Heritage Pacific Financial Collections/ JPMorgan Chase bank, NA 2000 West 15th Street Plano TX 75075 Acct# 107056060 Heritage Pacific Financial Collections/ Wells Fargo Bank 1421 N. Central Expy Plano TX 75075 Acct# 8073450671 Heritage Pacific Financial Collections/ Wachovia Acct #2000037673068 Heritage Pacific Financial Collections/ Ironstone Bank 9667 North Central Expy #130 Dallas TX 75231 Acct# 9160115270 Heritage Pacific Financial Collections
7. No such information is readily available.
8. See Interrogatory answer 6
9. See attached spreadsheet Exhibit 2
10. See Interrogatory answer 6
11. No
12. See Interrogatory answer 6
13. No
14. No such information exists.
15. No
16. None, HPF uses the address at 2200 K Ave #200 Plano TX 75074 as a place to receive mail and does not currently have any employees on payroll.
17. Not applicable see #16
18. No such information is readily available.

19. No such information is readily available.
20. HPF is a third party collection agency and does not hold ownership rights to any property or assets. It was simply a collection vehicle with limited and temporary assignment of the accounts it worked.
21. No
22. No such information is readily available.
23. Heritage Pacific Financial opened a revolving line of credit with HP Debt Exchange in April of 2009 to cover cost associated with the litigation and collection of accounts. The revolving line had a cap of five-million dollars and in return for the revolving line Heritage Pacific Financial would make payments to HP Debt from its profits derived from collection fees (30%) on accounts it settled through voluntary collections and litigation for debt owners. The revolving line was collateralized by all assets (office equipment, software, furniture and any partial ownership of collectable assets) owned or purchased by Heritage Pacific Financial. In 2009 Heritage Pacific Financial drew down over two-million of the available line and paid back almost all by late 2010. In 2011 Heritage Pacific Financial drew down another seven hundred-thousand dollars followed by another one-million in 2012. As of late 2012 Heritage Pacific Financial had defaulted on its revolving line in excess of one million dollars and HP Debt Exchange took action against the company's assets. Aside from a few open cases collection rights on all judgments and uncollected accounts have been transferred back to their original owners.
24. No
25. No tax returns filed

A) U.S. BANKRUPTCY COURT—CENTRAL DISTRICT OF CALIFORNIA

- a) GUERRERO, Eduardo, defendant in *Heritage Pacific Financial, LLC v. Guerrero*, Case No. 2:11-AP-01223, Bankr. C.D. California;
Transferred to Razor Capital, LLC on September 24, 2012
- b) SANTIZO, Omar, defendant in *Heritage Pacific Financial, LLC v. Santizo*, Case No. 6:10-AP-01525, Bankr. C.D. California;
Settled
- c) PINEDA, Joel R., defendant in *Heritage Pacific Financial, LLC v. Pineda*, Case No. 6:10-AP-01513, Bankr. C.D. California;
Settled
- d) LEMUS, Yolande F., defendant in *Heritage Pacific Financial, LLC v. Lemus*, Case No. 6:10-AP-01092, Bankr. C.D. California;
Transferred to Razor Capital, LLC on September 24, 2012
- e) OROZCO, Rosalba Patricia, defendant in *Heritage Pacific Financial, LLC v. Orozco*, Case No. 6:10-AP-01599, Bankr. C.D. California;
Transferred to Razor Capital, LLC on September 24, 2012
- f) VALADEZ, Rafael Razo, defendant in *Heritage Pacific Financial, LLC v. Valadez*, Case No. 9:10-AP-01282, Bankr. C.D. California;
Transferred to Razor Capital, LLC on September 24, 2012
- g) BIRCH, Danielle, defendant in *Heritage Pacific Financial, LLC v. Birch*, Case No. 8-10-AP-01480, Bankr. C.D. California;
Settled
- h) SANOSYAN, Vahram, defendant in *Heritage Pacific Financial, LLC v. Sanosyan*, Case No. 2:10-AP-03182, Bankr. C.D. California;
Transferred to Razor Capital, LLC on September 24, 2012
- i) GONZALEZ, Maria, defendant in *Heritage Pacific Financial, LLC v. Gonzalez*, Case No. 9:10-AP-01313, Bankr. C.D. California;
Transferred to Razor Capital, LLC on September 24, 2012
- j) MARQUEZ, Michael C., defendant in *Heritage Pacific Financial, LLC v. Marquez*, Case No. 9:11-AP-01042, Bankr. C.D. California;
Transferred to Razor Capital, LLC on September 24, 2012
- k) MEDINA, Miguel A., defendant in *Heritage Pacific Financial, LLC v. Medina*, Case No. 9:11-AP-01085, Bankr. C.D. California;
Transferred to Razor Capital, LLC on September 24, 2012
- l) VALENCIA, Jose Alfredo, defendant in *Heritage Pacific Financial, LLC v. Valencia*, Case No. 8:11-AP-01047, Bankr. C.D. California;
Owned by Redwater Funding Group transferred to Blue Star Holding Company, LLC 11/2012 and then transferred to Knightshead Fund on 6/2013

- m) PALACIO, Rodulfo, defendant in *Heritage Pacific Financial, LLC v. Palacio*, Case No. 8:11-AP-01022, Bankr. C.D. California;
Owned by Redwater Funding Group transferred to Blue Star Holding Company, LLC 11/2012 and then transferred to Knightshead Fund on 6/2013
- n) PETERS, Walter, defendant in *Heritage Pacific Financial, LLC v. Peters*, Case No. 2:11-AP-02290, Bankr. C.D. California;
Owned by Redwater Funding Group transferred to Blue Star Holding Company, LLC 11/2012 and then transferred to Knightshead Fund on 6/2013
- o) ESPINO, Servando, defendant in *Heritage Pacific Financial, LLC v. Espino*, Case No. 8:10-AP-01553, Bankr. C.D. California;
Owned by Redwater Funding Group transferred to Blue Star Holding Company, LLC 11/2012 and then transferred to Knightshead Fund on 6/2013
- p) CERVANTES, Albert, defendant in *Heritage Pacific Financial, LLC v. Cervantes*, Case No. 2:11-AP-01733, Bankr. C.D. California;
Transferred to Razor Capital, LLC on September 24, 2012
- q) RAMIREZ, Vivanco, defendant in *Heritage Pacific Financial, LLC v. Ramirez*, Case No. 2:11-AP-01150, Bankr. C.D. California;
Owned by Redwater Funding Group transferred to Blue Star Holding Company, LLC 11/2012 and then transferred to Knightshead Fund on 6/2013
- r) ANTUNEZ, Juan A., defendant in *Heritage Pacific Financial, LLC v. Atunez*, Case No. 6:11-AP-01569, Bankr. C.D. California;
Owned by Redwater Funding Group transferred to Blue Star Holding Company, LLC 11/2012 and then transferred to Knightshead Fund on 6/2013
- s) DRISCOLL, Robert Edward Jr., defendant in *Heritage Pacific Financial, LLC v. Driscoll*, Case No. 2:11-AP-02333, Bankr. C.D. California;
Owned by Redwater Funding Group transferred to Blue Star Holding Company, LLC 11/2012 and then transferred to Knightshead Fund on 6/2013
- t) MABSON, Duane, defendant in *Heritage Pacific Financial, LLC v. Mabson*, Case No. 2:10-AP-02445, Bankr. C.D. California;
Owned by Kelly & Jerri Worl
- u) ORTIZ, Rosa Maria, defendant in *Heritage Pacific Financial, LLC v. Ortiz*, Case No. 8:11-AP-01018, Bankr. C.D. California;
Owned by Redwater Funding Group transferred to Blue Star Holding Company, LLC 11/2012 and then transferred to Knightshead Fund on 6/2013
- v) LOA, Peter, defendant in *Heritage Pacific Financial, LLC v. Lao*, Case No. 2:11-AP-01335, Bankr. C.D. California;
Owned by Redwater Funding Group transferred to Blue Star Holding Company, LLC 11/2012 and then transferred to Knightshead Fund on 6/2013
- w) FUENTEZ, Deanna Marie, defendant in *Heritage Pacific Financial, LLC v. Fuentez*, Case No. 6:10-AP-01750, Bankr. C.D. California;

Settled

- x) AQUINO, Darwin Camerino, defendant in *Heritage Pacific Financial, LLC v. Aquino*, Case No. 1:11-AP-01268, Bankr. C.D. California;
Transferred to Razor Capital, LLC on September 24, 2012
- y) VITAL, Jaime, defendant in *Heritage Pacific Financial, LLC v. Vital*, Case No. 6:11-AP-01694, Bankr. C.D. California;
Owned by Redwater Funding Group transferred to Blue Star Holding Company, LLC 11/2012 and then transferred to Knightshead Fund on 6/2013
- z) TOVMASSIAN, Gary, defendant in *Heritage Pacific Financial, LLC v. Tovmassian*, Case No. 2:11-AP-01972, Bankr. C.D. California;
Owned by Redwater Funding Group transferred to Blue Star Holding Company, LLC 11/2012 and then transferred to Knightshead Fund on 6/2013
- aa) MARQUEZ, Sergio, defendant in *Heritage Pacific Financial, LLC v. Marquez*, Case No. 6:11-AP-01069, Bankr. C.D. California;
Owned by James W. Fields
- bb) TALAVERA, Elpidio, defendant in *Heritage Pacific Financial, LLC v. Talavera*, Case No. 6:11-AP-01910, kr. C.D. California;
Owned by Redwater Funding Group transferred to Blue Star Holding Company, LLC 11/2012 and then transferred to Knightshead Fund on 6/2013
- cc) VALENCIA, Hector G., defendant in *Heritage Pacific Financial, LLC v. Valencia*, Case No. 2:11-AP-02630, Bankr. C.D. California;
No Record of this Case
- dd) ROBES, Flora, defendant in *Heritage Pacific Financial, LLC v. Robes*, Case No. 2:11-AP-02375, Bankr. C.D. California;
Owned by Redwater Funding Group transferred to Blue Star Holding Company, LLC 11/2012 and then transferred to Knightshead Fund on 6/2013

B) U.S. BANKRUPTCY COURT---EASTERN DISTRICT OF CALIFORNIA

- a) VICENTE, Angelina, defendant in *Heritage Pacific Financial, LLC v. Vicente*, Case No. 11-02016, Bankr. E.D. California;
Owned by Redwater Funding Group transferred to Blue Star Holding Company, LLC 11/2012 and then transferred to Knightshead Fund on 6/2013
- b) ADAMS, Jeffrey P., defendant in *Heritage Pacific Financial, LLC v. Adams*, Case No. 11-02127, Bankr. E.D. California;

Owned by Redwater Funding Group transferred to Blue Star Holding Company, LLC 11/2012 and then transferred to Knightshead Fund on 6/2013

- c) TORRELL, Michael Andrew, defendant in *Heritage Pacific Financial, LLC v. Torrell*, Case No. 11-01080, Bankr. E.D.California;

Owned by Redwater Funding Group transferred to Blue Star Holding Company, LLC 11/2012 and then transferred to Knightshead Fund on 6/2013

- d) GARCIA, Adriana, defendant in *Heritage Pacific Financial, LLC v. Garcia*, Case No. 10-02766, Bankr. E.D.California;

Owned by Redwater Funding Group transferred to Blue Star Holding Company, LLC 11/2012 and then transferred to Knightshead Fund on 6/2013

- e) BEELARD, Jessica and Eric, defendant in *Heritage Pacific Financial, LLC v. Beelard*, Case No. 10-02798, Bankr. E.D.California;

Owned by Equity Capital Group

- f) RAMOS, Samuel, defendant in *Heritage Pacific Financial, LLC v. Ramos*, Case No. 10-09066, Bankr. E.D.California;

Owned by Redwater Funding Group transferred to Blue Star Holding Company, LLC 11/2012 and then transferred to Knightshead Fund on 6/2013

- g) MORENO, Victor, defendant in *Heritage Pacific Financial, LLC v. Moreno*, Case No. 11-01113, Bankr. E.D.California;

Owned by Redwater Funding Group transferred to Blue Star Holding Company, LLC 11/2012 and then transferred to Knightshead Fund on 6/2013

- h) COUNTOURIOTIS, George Edward, defendant in *Heritage Pacific Financial, LLC v. Countouriotis*, Case No. 10-02744, Bankr. E.D.California;

Owned by HPAC1 Pool 5

- i) MARTINEZ, Gerardo and Martha, defendant in *Heritage Pacific Financial, LLC v. Martinez*, Case No. 11-01198, Bankr. E.D.California;

Owned by Reggiano Marketing

- j) JEFFORD, Nadine Ann, defendant in *Heritage Pacific Financial, LLC v. Jefford*, Case No. 11-02246, Bankr. E.D.California;

Settled

- k) Jimenez, Roger Avila, defendant in *Heritage Pacific Financial, LLC v. Jimenez*, Case No. 10-02525, Bankr. E.D. California;

Owned by Redwater Funding Group transferred to Blue Star Holding Company, LLC 11/2012 and then transferred to Knightshead Fund on 6/2013

C) U.S. BANKRUPTCY---NORTHERN DISTRICT OF CALIFORNIA

- a) MALDIA, Kim, defendant in *Heritage Pacific Financial, LLC v. Maldia*, Case No. 11-05013, Bankr. N.D. California;

Owned by Redwater Funding Group transferred to Blue Star Holding Company, LLC 11/2012 and then transferred to Knightshead Fund on 6/2013

- b) ROMAN, Ana Laura, defendant in *Heritage Pacific Financial, LLC v. Roman*, Case No. 11-05134, Bankr. N. D. California;

Owned by James W. Fields

D) U.S. BANKRUPTCY COURT---Southern District of California

- a) JORDAN, Verena, defendant in *Heritage Pacific Financial, LLC v. Jordan*, Case No. 11-90051, Bankr. S.D. California;

Owned by United States of America Department of Justice

- b) PROO, Barbara, defendant in *Heritage Pacific Financial, LLC v. Proo*, Case No. 11-90029, Bankr. S.D. California;

Owned by HPAC1 Pool 4

- c) LUND, James Thomas, defendant in *Heritage Pacific Financial, LLC v. Lund*, Case No. 11-90399, Bankr. S.D. California;

Owned by James W. Fields

- d) DEKOEKOEK, Laurens, defendant in *Heritage Pacific Financial, LLC v. Dekoeckoeck*, Case No. 11-90491, Bankr. S.D. California;

Owned by James W. Fields

E) U.S. BANKRUPTCY COURT---District of Nevada

- a) SPARTACUS, Susan, defendant in *Heritage Pacific Financial, LLC v. Spartacus*, Adversary Proceeding No. 11-01145, Bankr. D. Nevada;

Owned by James W. Fields

Primary Borrower Name	Judgment Amount	Judgment Date
Alberto Herrera	\$ 130,355.00	8/13/2010
Leonardo M. Ariza	\$ 62,173.36	1/31/2011
Benito Omana	\$ 117,355.00	10/15/2010
JESUS LUNA	\$ 120,740.94	12/9/2010
Karla Escobar	\$ 108,355.00	9/17/2010
Tony Ornelas	\$ 130,355.00	9/14/2010
Johnathan David Greaney	\$ 134,279.62	2/28/2011
Roselin Cornejo	\$ 76,355.00	9/9/2010
Jorge Reque	\$ 68,355.00	9/23/2010
ISIDRO ZUNIGA	\$ 155,355.00	8/23/2010
Erica Garay	\$ 108,448.38	12/22/2010
Juan Diaz	\$ 66,122.57	11/4/2010
Everly Aguayo	\$ 71,372.04	11/1/2010
Luis Edmundo Lopez	\$ 121,755.00	11/19/2010
Miguel A. Alvarez	\$ 123,746.45	11/8/2010
MONIQUE HUEREQUE	\$ 50,655.00	10/19/2010
SUSAN GONZALEZ	\$ 58,591.33	6/3/2011
JACQUELINE KNIGHT	\$ 101,237.37	11/2/2010
MATTHEW WEATHERLY	\$ 23,539.64	12/21/2010
Erika Escobar	\$ 128,997.64	12/20/2010
Thomas Cirineo	\$ 133,849.21	11/24/2010
DOROTHY COTTRELL	\$ 84,040.22	12/10/2010
William Guevara	\$ 108,955.74	10/13/2010
Hugo Pons	\$ 58,996.31	11/9/2010
NICOLE MCNAMARA	\$ 74,845.19	3/10/2011
Wei Zheng Lin	\$ 110,680.11	3/4/2011
RYAN REPOSA	\$ 89,725.64	1/24/2011
Miguel Garcia	\$ 43,727.40	1/13/2011
BRENDA HILL	\$ 82,242.71	12/7/2010
Ricardo Arellano	\$ 149,780.71	12/22/2010
ESAU ALVAREZ	\$ 125,355.00	12/14/2010
JOHN M. CARLOS	\$ 24,296.52	12/21/2010
MARTHA FRANCO	\$ 63,046.88	1/27/2011
Jose Luis Garduno	\$ 111,075.78	3/10/2011
Yezid A. Ortiz	\$ 70,081.62	1/31/2011
Rodrigo Borja	\$ 103,297.05	12/14/2010
Leroy C. Gonzales	\$ 85,013.32	11/10/2010
Maria Acevedo	\$ 146,558.16	11/10/2010
Puntilar June Chautavipat	\$ 113,444.83	5/10/2011
Esperanza Dominguez	\$ 65,636.30	3/7/2011
MARCELINO MONGE ALAS	\$ 76,619.98	3/7/2011
MARIA ARIAS	\$ 58,245.99	3/7/2011
GENARO MILLAN	\$ 88,355.00	3/4/2011
URBANA M. CABRERA	\$ 154,244.67	1/6/2011
MARIA AGUILAR	\$ 75,128.05	3/7/2011
CARLOS WASHINGTON GARCIA	\$ 114,824.19	3/7/2011

Alejandro Jimenez	\$	60,162.65	1/27/2011
Emmanuel Nsahlaï	\$	147,710.16	9/29/2010
Matthew Alfano	\$	120,314.49	3/25/2011
Richard Z. Garcia	\$	112,355.00	1/12/2011
LUIS FLORES	\$	64,169.57	1/31/2011
BERJ WARTANIAN	\$	199,452.76	12/28/2010
Jerry Parker	\$	150,018.45	3/2/2011
Jennifer Hernandez	\$	43,398.78	5/27/2011
EURELL E. CHAMBERS	\$	58,300.87	11/8/2010
JOSE A. RAUDA	\$	140,344.01	6/9/2011
NARDA CHICA	\$	120,265.22	6/2/2011
MIKKI WADE	\$	50,076.92	6/16/2011
Robert J. Cooney	\$	292,036.07	2/7/2011
ISIDRO C. GARCIA	\$	79,141.58	3/28/2011
Gerardo Lopez	\$	129,797.66	2/23/2011
JOSE BALLESTEROS	\$	67,854.76	3/24/2011
LUIS SERNA	\$	84,232.79	3/24/2011
SALATIEL MONTOYA	\$	80,068.35	8/30/2011
JOHANNA GARAYZAR	\$	79,131.28	4/13/2011
Kelly Suzanne Barnes	\$	156,155.00	2/7/2011
JOANNA DIAZ	\$	72,055.00	4/8/2011
Martha Escandon	\$	124,355.00	3/16/2011
Marilou Hilario	\$	120,335.00	5/9/2011
LUIS R. CAMPILLO	\$	126,166.96	5/31/2011
Lidia M. Quintana	\$	76,030.54	3/11/2011
Dolores D. Gapo	\$	85,271.80	4/5/2011
Luis Martinez	\$	89,906.25	2/1/2011
TOBIAS GONZALEZ	\$	80,353.90	4/18/2011
Raul Salomon	\$	43,024.07	3/30/2011
DORA DE LEMUS	\$	36,666.96	5/17/2011
Zoltan Makula	\$	53,336.71	6/16/2011
Yolanda A. Arellano	\$	325,605.00	6/7/2011
JAIME PEREZ	\$	57,321.85	4/4/2011
Berta A. Rico	\$	69,190.04	5/26/2011
ARACELY RAMIREZ	\$	124,901.52	wasn't signed
Carlos Torres	\$	331,605.00	4/12/2011
Francisco Mariscal	\$	87,735.36	2/9/2011
Elda Solorio	\$	72,011.54	8/1/2011
Rigoberto Hurtada	\$	33,517.19	5/16/2011
Antonio Rodriguez	\$	74,355.00	5/25/2011
Thomas Hoy	\$	66,036.85	wasn't signed
Donna Goldman	\$	85,243.95	wasn't signed
San Yusen Bon	\$	188,119.06	3/9/2011
JOSE PULIDO	\$	62,931.87	3/28/2011
ANGEL GONZALEZ	\$	85,178.74	7/20/2011
Ruben Guerrero	\$	110,481.96	3/29/2011
STEVEN PHILLIPS	\$	79,105.00	11/12/2010

Eulogio Balderas	\$	52,325.41	2/15/2011
Yazmin Gonzalez	\$	61,416.64	9/20/2011
CHAD GRIMENSTEIN	\$	180,355.00	12/21/2010
Ronald Giovanni Fuentes	\$	58,570.00	9/13/2010
FRANCISCO J BRAVO LOPEZ	\$	55,605.00	4/13/2011
Mel C. Gutierrez	\$	51,765.37	1/17/2011
Calet G Barrera	\$	124,364.40	1/17/2011
Yolanda Rosas Meneses	\$	109,458.74	1/17/2011
Villarosal A. Rabino	\$	113,408.81	4/11/2011
ALEJANDRO DELGADO	\$	60,000.00	wasn't signed
HARRY SUNDBERG and Shawna Owens	\$	103,825.00	1/4/2011
GABRIELA MORALES	\$	73,280.37	2/1/2011